

STATE OF CALIFORNIA  
STATE AND CONSUMER SERVICES AGENCY  
CALIFORNIA BUILDING STANDARDS COMMISSION  
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Office Use Item No. \_\_\_\_\_

**PARTICIPATION COMMENTS FOR THE NOTICE DATED MARCH 18, 2008**  
Written comments are to be sent to the above address.

**WRITTEN COMMENT DEADLINE: MAY 12, 2008**

Date: May 9, 2008

From: Mehran Keshavarzian, SE  
Name (Print or type)

**Individual**

Agency, jurisdiction, chapter, company, association, individual, etc.

<b>1239 20th Street</b>	<b>Santa Monica</b>	<b>CA</b>	<b>90404</b>
Street	City	State	Zip

I/we ☐ (do) ☒ (do not) agree with:

The Agency proposed modifications As Submitted on Section No. **1609.6 (OPSHPD 2)**  
and request that this section or reference provision be recommended: **Alternate All-Heights Method**

☐ Approved ☐ Disapproved ☒ Held for Further Study ☐ Approved as Amended

to the proposing state agency.

**Suggested Revisions to the Text of the Regulations:**

**Reason:** [The reason should be concise. If the request is for "Disapproval," "Further Study," or "Approve As Amend", identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

The proposed "Alternate All-height Method" duplicates the code Analytical Procedure Method 2 for all heights, (Criteria 1 of Health & Safety Code Section 18930). In the opening statement, the reason given to justify the need for this new method is that "The all heights wind provisions of ASCE 7 are time consuming and confusing. Many engineers make significant errors in their use of this method."

Engineering work in general is time consuming and in itself does not constitute a reason to simplify the wind section of code. There are computer spreadsheets that can deal with this issue.

As for the "confusing" part, which may lead to many engineers making significant errors in their use, it appears that this is too general statement without basis. If the confusing part is due to the way the ASCE 7 wind section is written, similar methods to ASCE 7 wind method 2 have been used by other states as part of BOCA, SBC, or IBC at least since 2002. In addition, ASCE 7-05 was adopted by CBC 2007 only since January 2007. Furthermore, for most buildings, the ASCE 7 method 2 is as simple as the proposed method without the limitations.

In summary, without proper justification and without assurances that the results of this proposed method will consistently provide equal or more conservative results to the code method, the proposed method should not be added to the code, since there are already several methods in ASCE 7 for wind force calculations. These are Method 1 (Simplified Procedure), Method 2a (Analytical Procedure for Low-Rise Buildings), Method 2b (Analytical Procedure for buildings of all heights), and Method 3 (Wind Tunnel Procedure).

#### **HEALTH & SAFETY CODE SECTION 18930**

##### **SECTION 18930. APPROVAL OR ADOPTION OF BUILDING STANDARDS; ANALYSIS AND CRITERIA; REVIEW CONSIDERATIONS; FACTUAL DETERMINATIONS**

- (a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:
- (1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.
  - (2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.
  - (3) The public interest requires the adoption of the building standards.
  - (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
  - (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
  - (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
  - (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
    - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
    - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
  - (8) The format of the proposed building standards is consistent with that adopted by the commission.
  - (9) The proposed building standard, if it promotes fire and panic safety as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.